### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Norfolk Division

## RECOVERY LIMITED PARTNERSHIP, Plaintiff,

v. Civil Action No.: 2:87-cv-00363

# UNIDENTIFIED, WRECKED AND ABANDONED SAILING VESSEL, etc., Defendant.

#### **STATUS REPORT TO COURT**

Recovery Limited Partnership (the "Plaintiff" or "RLP"), by counsel, respectfully submits this Report to the Court as salvor-in-possession of the wreck of the SS CENTRAL AMERICA ("SSCA"). Plaintiff has previously submitted twenty-five reports, two in Civil Action No. 2:14-cv-160, and twenty-three in Civil Action No. 2:87-cv-363. *See* D.E. # 21 and 90 (No. 2:14-cv-160); D.E. # 104, 130, 163, 175, 176, 177, 195, 202, 209, 233, 256, 264, 267, 273, 278, 280, 281, 289, 290, 291, 292, 293, and 294 (No. 2:87-cv-363).

As reported in November 2022 (D.E. #294), the Trustee was working with salvage advisor Craig Mullen on planning for the next salvage operation, which was targeted for June or July of 2023. The Trustee received a proposal from a competent firm for 2023 salvage operations. Subsequently, the salvor notified Mr. Mullen and the Trustee that the vessel identified for the operation was no longer available during the planned salvage window. Given that development, the Trustee is now making plans for salvage operations in 2024.

For confidentiality reasons, the Trustee has not included the salvage proposal as an exhibit to this report but is prepared to file the proposal with the Court under seal should the Court desire to review it.

In addition to planning for salvage operations in 2024, the Trustee recently entered into a contract to allow the use of video footage from prior expeditions for a three-part documentary created by the BBC Documentary Unit to be broadcast on the National Geographic Channel.

The Trustee is aware that exclusive jurisdiction over the salvage of the wreck of the S.S. Central America lies with this Court. He understands his obligation to notify this Court regarding any future salvage and will seek advance approval before any such salvage is performed in accordance with the Order entered January 11, 2019. D.E. # 276.

The Trustee and counsel are available to address any questions that the Court may have regarding this report.

This 26th day of April, 2023.

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983) CRENSHAW, WARE & MARTIN, PLC. 150 West Main Street, Suite 1500 Norfolk, Virginia 23510

Telephone: (757) 623-3000 Facsimile: (757) 623-5735 jchapman@cwm-law.com

Conrad M. Shumadine (VS. No. 4325) Brett A. Spain (VS. No. 44567) WILLCOX & SAVAGE, P.C. 440 Monticello Avenue, Suite 2200 Norfolk, Virginia 23510 Telephone: (757) 628-5500

Facsimile: (757) 628-5500 Facsimile: (757) 628-5569 cshumadine@wilsav.com bspain@wilsav.com

Counsel for Recovery Limited Partnership

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of April, 2023, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983)

Counsel for Recovery Limited Partnership

CRENSHAW, WARE & MARTIN, PLC.

150 West Main Street, Suite 1500

Norfolk, Virginia 23510

Telephone: (757) 623-3000 Facsimile: (757) 623-5735 jchapman@cwm-law.com